IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

	Re: Docket No. 385	
Debtors.) (Jointly Administered)	
JOANN INC., et al., ¹) Case No. 25-10068 (CT	G)
In re:) Chapter 11	
)	

NOTICE OF FILING REVISED PROPOSED
ORDER (I) AUTHORIZING AND APPROVING THE CONDUCT OF STORE
CLOSING SALES, WITH SUCH SALES TO BE FREE AND CLEAR OF ALL
LIENS, CLAIMS, AND ENCUMBRANCES AND (II) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that, on February 12, 2025, the above-captioned debtors and debtors in possession (collectively, the "Debtors") filed the Motion of Debtors for Entry of an Order (I) Authorizing and Approving the Conduct of Store Closing Sales, With Such Sales to Be Free and Clear of All Liens, Claims, and Encumbrances and (II) Granting Related Relief [Docket No. 385] (the "Motion"). Attached thereto as Exhibit A was a proposed form of order granting the relief requested in the Motion (the "Proposed Order").

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit 1** is a revised proposed form of order granting the relief requested in the Motion (the "Revised Proposed Order").

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit 2** is a redline comparing the Revised Proposed Order to the Proposed Order.

The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

Dated: February 13, 2025 Wilmington, Delaware

/s/ Patrick J. Reilley

COLE SCHOTZ P.C.

Patrick J. Reilley (No. 4451) Stacy L. Newman (No. 5044) Michael E. Fitzpatrick (No. 6797) Jack M. Dougherty (No. 6784) 500 Delaware Avenue, Suite 1410

Wilmington, Delaware 19801 Telephone: (302) 652-3131 Facsimile: (302) 652-3117

Email: preilley@coleschotz.com

snewman@coleschotz.com mfitzpatrick@coleschotz.com jdougherty@coleschotz.com

KIRKLAND & ELLIS LLP KIRKLAND & ELLIS INTERNATIONAL LLP

Joshua A. Sussberg, P.C. (admitted *pro hac vice*) Aparna Yenamandra, P.C. (admitted *pro hac vice*) 601 Lexington Avenue

New York, New York 10022 Telephone: (212) 446-4800 Facsimile: (212) 446-4900

Email: joshua.sussberg@kirkland.com

aparna.yenamandra@kirkland.com

- and -

Anup Sathy, P.C. (admitted *pro hac vice*) Jeffrey Michalik (admitted *pro hac vice*) Lindsey Blumenthal (admitted *pro hac vice*) 333 West Wolf Point Plaza

Chicago, Illinois 60654

Telephone: (312) 862-2000 Facsimile: (312) 862-2200

Email: anup.sathy@kirkland.com

jeff.michalik@kirkland.com lindsey.blumenthal@kirkland.com

Proposed Co-Counsel to the Debtors and Debtors in Possession

Proposed Co-Counsel to the Debtors and Debtors in Possession